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1 ANN BIRMINGHAM SCHEEL

2 Acting United States Attorney

3 District of Arizona

4 ROBERT L. MISKELL

5 DILLON A. FISHMAN

6 Assistant U.S. Attorneys

7 Arizona State Bar No. 015198, 024259

8 405 West Congress, Suite 4800

9 Tucson, Arizona 85701-5040

10 Robert.Miskell@usdoj.gov

11 Dillon.Fishman@usdoj.gov

12 Telephone: (520) 620-7300

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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF ARIZONA

13 United States of America,

14 Plaintiff,

15 v.

16 Marshall Edwin Home, and  
17 Margaret Elizabeth Broderick,

18 Defendant.

CR 11-2498-TUC-DCB-GEE

19 SUPERSEDING INDICTMENT

Violations: 18 U.S.C. § 152(4)  
18 U.S.C. § 1341  
18 U.S.C. § 1343

(Fraudulently Presenting False Claims  
In Bankruptcy; Mail Fraud; Wire  
Fraud)

22 THE GRAND JURY CHARGES:

23 COUNT 1

24 On or about March 28, 2011, at or near Tucson, in the District of Arizona, **Marshall**  
25 **Edwin Home and Margaret Elizabeth Broderick** knowingly and fraudulently presented and  
26 caused to be presented a false claim for proof against the estate of the debtor, in the case styled  
27  
28

1 "In Re: United States Corp" in the United States Bankruptcy Court for the District of Arizona  
2 in Tucson (Bankruptcy Ct. No. 04:11-06731), asserting a claim of \$2,500,000,000.00 on behalf  
3 of **Marshall Edwin Home**, whereas, as the defendants then and there well knew and believed,  
4 **Marshall Edwin Home** did not have a claim for \$2,500,000,000.00 against the alleged debtor,  
5 in violation of Title 18, United States Code, Section 152(4).  
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7

8 **COUNT 2**

9 On or about April 20, 2011, at or near Tucson, in the District of Arizona, **Marshall**  
10 **Edwin Home** and **Margaret Elizabeth Broderick** knowingly and fraudulently presented and  
11 caused to be presented a false claim for proof against the estate of the debtor, in the case styled  
12 "In Re: United States Corp" in the United States Bankruptcy Court for the District of Arizona  
13 in Tucson (Bankruptcy Ct. No. 04:11-06731), asserting a claim of \$50,000,000.00 on behalf of  
14 another individual ("J.A.") whereas, as the defendants then and there well knew and believed,  
15 J.A. did not have a claim for \$50,000,000.00 against the alleged debtor, in violation of Title 18,  
16 United States Code, Section 152(4).  
17  
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19 **COUNT 3**

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21 On or about April 14, 2011, at or near Tucson, in the District of Arizona, **Marshall**  
22 **Edwin Home** and **Margaret Elizabeth Broderick** knowingly and fraudulently presented and  
23 caused to be presented a false claim for proof against the estate of the debtor, in the case styled  
24 "In Re: United States Corp" in the United States Bankruptcy Court for the District of Arizona  
25 in Tucson (Bankruptcy Ct. No. 04:11-06731), asserting a claim of \$253,000,000,000.00 on  
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1 behalf of other individuals ("C.B.P and A.H.P.") whereas, as the defendants then and there well  
2 knew and believed, C.B.P. and A.H.P. did not have a claim for \$253,000,000,000.00 against the  
3 alleged debtor, in violation of Title 18, United States Code, Section 152(4).  
4

5 **COUNT 4**

6 1. Beginning in approximately December, 2010, and continuing until July, 2011, the  
7 defendants **Marshall Edwin Home** and **Margaret Elizabeth Broderick** devised a scheme and  
8 artifice to defraud, and to obtain money and property by means of false pretenses.  
9

10 2. It was part of the scheme that defendants **Marshall Edwin Home** and **Margaret**  
11 **Elizabeth Broderick** operated the "The Individual Rights Party; Mortgage Rescue Service," in  
12 south Tucson, Arizona. Defendants **Marshall Edwin Home** and **Margaret Elizabeth**  
13 **Broderick** advertised to the public that they could provide help to individuals whose mortgages  
14 were being foreclosed, or about to be foreclosed. Defendants **Marshall Edwin Home** and  
15 **Margaret Elizabeth Broderick** falsely represented to these individuals that they had a method  
16 of defeating foreclosures. They charged individuals \$500 to participate in this method of  
17 defeating foreclosures. In fact, defendants **Marshall Edwin Home's** and **Margaret Elizabeth**  
18 **Broderick's** method of defeating foreclosure consisted of filing paperwork making frivolous  
19 arguments to courts that ultimately did not provide relief to those individuals.  
20  
21

22 3. It was further part of the scheme that defendants **Marshall Edwin Home** and  
23 **Margaret Elizabeth Broderick** filed and caused to be filed, usually with the Secretary of State  
24 for the state of California, financing statements under the Uniform Commercial Code ("U.C.C.")  
25  
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1 which falsely claimed that individuals participating in their method of defeating foreclosures had  
2 a secured interest in property of others. In fact, no such secured interests existed.

3  
4 4. It was further part of the scheme that defendants **Marshall Edwin Home** and  
5 **Margaret Elizabeth Broderick** filed and caused to be filed an Involuntary Petition in  
6 Bankruptcy in the United States Bankruptcy Court for the District of Arizona in Tucson  
7 (Bankruptcy Ct. No. 04:11-06731). This involuntary petition sought to place the United States,  
8 which defendant **Marshall Edwin Home** called "U.S. Corp," and other entities which defendant  
9 **Marshall Edwin Home** characterized as agents and instrumentalities of the United States  
10 [hereinafter the "United States"], into bankruptcy. The involuntary petition falsely claimed that  
11 **Marshall Edwin Home** had a claim against the United States of over \$3 billion, whereas he then  
12 and there well knew he did not have such a claim against the United States.

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14  
15 5. It was further part of the scheme that defendants **Marshall Edwin Home** and  
16 **Margaret Elizabeth Broderick** represented and caused to be represented to individuals who  
17 participated in their method of defeating foreclosures that their foreclosures would become part  
18 of a "larger, overall bankruptcy liquidation." Defendants **Marshall Edwin Home** and **Margaret**  
19 **Elizabeth Broderick** claimed that the individual's "foreclosure case immediately stalls by virtue  
20 of being included as a matter of record."

21  
22  
23 6. It was further part of the scheme that defendants **Marshall Edwin Home** and  
24 **Margaret Elizabeth Broderick** filed and caused to be filed in the United States Bankruptcy  
25 Court for the District of Arizona in Tucson in case no. 04:11-06731 "Proof of Claim" forms  
26  
27  
28

1 against the United States. Defendants **Marshall Edwin Home** and **Margaret Elizabeth**  
2 **Broderick** filed and caused Proof of Claim forms to be filed on behalf of individuals who  
3 participated in their method of defeating mortgage foreclosures. These Proof of Claim forms  
4 falsely stated that those individuals had monetary claims against the United States. Defendants  
5 **Marshall Edwin Home** and **Margaret Elizabeth Broderick** filed and caused to be filed  
6 approximately 173 false Proof of Claim forms totaling over \$250 billion. Attached to these false  
7 Proof of Claim forms were the false financing statements referenced in paragraph 3.  
8  
9

10 7. It was further part of the scheme that defendant **Marshall Edwin Home** registered the  
11 name "Federal National Mortgage Association" with the Arizona Secretary of State as a Trade  
12 Name. The Federal National Mortgage Association is the official name of a government  
13 sponsored entity better known as "Fannie Mae." The true Federal National Mortgage  
14 Association was chartered by Congress with a mission to provide liquidity, stability and  
15 affordability to the U.S. housing and mortgage markets. Defendant Marshall Edwin Home was  
16 not an authorized representative of the true Federal National Mortgage Association and did not  
17 have authority to convey property owned by the association.  
18  
19  
20

21 8. It was further part of the scheme that defendants **Marshall Edwin Home** and  
22 **Margaret Elizabeth Broderick** filed and caused to be filed with county recorders deeds for real  
23 property that had been acquired by the true Federal National Mortgage Association. These deeds  
24 purported to transfer title from the true Federal National Mortgage Association to the  
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26  
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1 "Independent Rights Party" an entity controlled by defendants **Marshall Edwin Home** and  
2 **Margaret Elizabeth Broderick**.

3  
4 9. It was further part of the scheme that defendants **Marshall Edwin Home** and  
5 **Margaret Elizabeth Broderick** also took the same acts alleged in paragraphs 7 and 8 with the  
6 "Federal Home Loan Mortgage Corporation" (better known as "Freddie Mac") and property  
7 owned by the true Federal Home Loan Mortgage Corporation.  
8

9 10. It was further part of the scheme that defendants **Marshall Edwin Home** and  
10 **Margaret Elizabeth Broderick** conducted purported transfers with at least 28 properties in the  
11 District of Arizona and elsewhere owned by the true Federal National Mortgage Association and  
12 the true Federal Home Loan Mortgage Corporation. These purported transfers interfered with  
13 the real owners rights in the properties, causing them a loss.  
14

15 11. It was further part of the scheme that defendants **Marshall Edwin Home** and  
16 **Margaret Elizabeth Broderick** would then rent the real properties referred to in the preceding  
17 paragraph to unsuspecting tenants. These tenants paid defendants **Marshall Edwin Home** and  
18 **Margaret Elizabeth Broderick** security deposits and rent to which the defendant were not  
19 entitled.  
20

21 12. From approximately December, 2010, and continuing until July, 2011, in the District  
22 of Arizona and elsewhere, the defendants **Marshall Edwin Home** and **Margaret Elizabeth**  
23 **Broderick**, with the intent to defraud, devised and willfully participated in, with knowledge of  
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1 its fraudulent nature, the above-described scheme and artifice to defraud and obtain money and  
2 property by materially false and fraudulent pretenses, representations, and promises.

3  
4 13. On or about January 5, 2011, at or near Tucson in the District of Arizona, for the  
5 purpose of executing or attempting to execute the above-described scheme and artifice to  
6 defraud and deprive, defendants **Marshall Edwin Home** and **Margaret Elizabeth Broderick**  
7 knowingly placed and caused to be place in an authorized depository for mail, to be sent and  
8 delivered by the U.S. Postal Service, the following matter: a letter to a mortgage company  
9 containing a false financing statement and other documents related to the mortgage of R.A.A.  
10

11 All in violation of Section 1341 of Title 18 of the United States Code.  
12

13 **COUNT 5 THROUGH 10**

14 Paragraphs 1 through 12 of Count 4 of this indictment are re-alleged and incorporated by  
15 reference.  
16

17 On or about each of the dates set forth below, at or near Tucson, in the district of Arizona  
18 and elsewhere, the defendants **Marshall Edwin Home** and **Margaret Elizabeth Broderick** for  
19 the purpose of executing the scheme described above, and attempting to do so, caused to be  
20 transmitted by means of wire communication in interstate commerce the signals and sounds  
21 described below for each count, each transmission constituting a separate count:  
22

23	COUNT	DATE	DESCRIPTION
24			
25	5	12/2/2010	E-mail from R.H. regarding participating in the defendants' 26 mortgage relief program
27			
28			

1	6	3/14/2011	Internet transmission to the California Secretary of State regarding
2			a U.C.C. Financing Statement
3	7	3/14/2011	E-mail to R.A.A. relating to R.A.A.'s participation in the
4			involuntary bankruptcy proceeding
5	8	4/6/2011	E-mail from C.L.G. stating that she will mail the information
6			requested by defendant <b>Marshall Edwin Home</b> .
7	9	4/17/2011	Internet transmission to the California Secretary of State regarding
8			a U.C.C. Financing Statement
9	10	5/12/2011	Internet transmission to the California Secretary of State regarding
10			a U.C.C. Financing Statement

All in violation of Sections 1343 and 2 of Title 18 of the United States Code.

A TRUE BILL

**/s/**

FOREPERSON OF THE GRAND JURY

ANN BIRMINGHAM SCHEEL  
Acting United States Attorney  
District of Arizona

**/s/**

Assistant U.S. Attorney

**SEP 07 2011**

**REDACTED FOR  
PUBLIC DISCLOSURE**